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July 31, 2007

BY HAND DELIVERY

Honorable Alvin K. Hellerstein
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

*So ordered
8/1/07
Alvin K. Hellerstein*

Re: Raymond Davis v. City of New York et al., 07 CV 6430 (AKH)(RLE)

Your Honor:

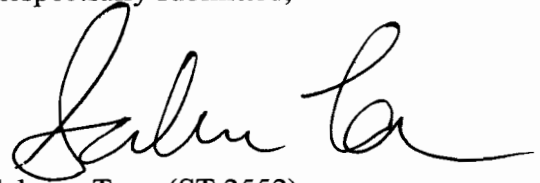
As the Assistant Corporation Counsel assigned to the defense of the above-referenced civil rights action, I write to respectfully request that defendant City of New York's time to answer or otherwise respond to the complaint in this action be enlarged sixty (60) days to and including October 9, 2007. I have conferred with plaintiff's counsel, Gregory Antollino, Esq., and he consents to this initial sixty (60) day enlargement of time.

The complaint alleges, *inter alia*, that on June 21, 2006, unidentified members of the New York City Police Department employed excessive force and falsely arrested plaintiff in violation of his state and federal civil rights. As a threshold matter, an enlargement of time will allow this office to forward to plaintiff for execution authorizations for the release of the underlying criminal and medical records. Defendant cannot obtain these records without the authorizations, and without the records, defendant cannot properly assess this case or respond to the complaint. Accordingly, defendant requires this enlargement so that this office may obtain the underlying documentation, properly investigate the allegations of the complaint and fulfill its obligations under Rule 11 of the Federal Rules of Civil Procedure.

No previous request for an enlargement of time has been made. Accordingly, defendant respectfully requests that its time to respond to the complaint be extended to and including October 9, 2007.

I thank Your Honor for considering this request.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Sabrina Tann', with a stylized flourish at the end.

Sabrina Tann (ST 2552)
Assistant Corporation Counsel
Special Federal Litigation Division

cc: Gregory Antollino, Esq.
Attorney for Plaintiff
(By Facsimile)